## IN THE UNITED STATES DISTRICT COURT FOR THENORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

EUNICE PERRY	)	
	)	
Plaintiff,	)	
	)	CIVIL ACTION FILE NO.:
	)	1:23-CV-03036-VMC-CMS
EMORY HEALTHCARE, INC.,	)	
	)	
Defendant.	)	

## DEFENDANT'S MOTION TO STAY THE DEADLINES FOR THE PARTIES' RULE 26F EARLY PLANNING CONFERENCE, INITIAL DISCLOSURES, AND JOINT PRELIMINARY REPORT AND DISCOVERY PLAN

COMES NOW Defendant Emory Healthcare, Inc. ("EHC" or "Defendant"), pursuant to Fed. R. Civ. P. 26(d) and L.R. 26.2(b), and respectfully moves this Court for an Order staying the deadlines for the parties' Fed. R. Civ. P. 26(f) early planning conference, Initial Disclosures and Joint Preliminary Report and Discovery Plan, until after the Court rules on Defendant's Motion to Dismiss Plaintiff's Complaint (Doc. 5) In support of its motion, Defendant relies upon the accompanying memorandum of law filed contemporaneously with this motion and the pleadings on record in this matter.

WHEREFORE, Defendant respectfully requests that the Court stay the deadline for the parties' Rule 26(f) early planning conference until sixteen (16) days after the Court issues a final ruling on the Defendant's Motion to Dismiss, if such ruling is not

dispositive of all claims. Defendant also requests that the Court stay the deadlines for the parties' Initial Disclosures and Joint Preliminary Report and Discovery Plan until thirty (30) days after the Court rules on Defendant's Motion to Dismiss Plaintiff's Complaint, if such ruling is not dispositive of all claims.

Respectfully submitted this 3rd day of August, 2023.

## LEWIS BRISBOIS BISGAARD SMITH, LLP

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**CERTIFICATE OF COMPLIANCE** 

The undersigned counsel hereby certifies that this **DEFENDANT'S MOTION TO** STAY THE DEADLINES FOR THE PARTIES' RULE 26F EARLY PLANNING CONFERENCE, INITIAL DISCLOSURES, AND **JOINT** PRELIMINARY REPORT AND DISCOVERY PLAN complies with the typevolume limitations set forth in Rule 5.1 of the Local Rules of the United States District

Court for the Northern District of Georgia and has been typed in Times New Roman

14 count.

/s/ Toni J. Read Toni J. Read